Case 15-23886-CMB Doc 81 Filed 10/30/20 Entered 10/30/20 12:16:40 Desc Main Document Page 1 of 4

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UNITED STATES BANKRUPTCY COURT		
WESTERN DISTRICT OF PENNSYLVANIA		
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IN RE:	:	CASE NO.: 15-23886-CMB
	:	CHAPTER: 13
Charles J. Reeves	:	
aka Charles J. Reeves, Jr.,	:	NOTICE OF APPEARANCE
	:	
Debtor.	:	HON. JUDGE.: Carlota M. Bohm
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PLEASE TAKE NOTICE that the undersigned hereby appears in the above-captioned Chapter 13 case on behalf BSI Financial Services as servicer for Chalet Properties III, LLC, and hereby requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon the following:

FRIEDMAN VARTOLO, LLP Attorneys for BSI Financial Services 1325 Franklin Avenue, Suite 230 Garden City, NY 11530 bankruptcy@FriedmanVartolo.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes all pleadings of any kind including, without limitation, all notices, motions, complaints and orders, whether written or oral, formal or informal, however transmitted, related in any way to the debtor, its property or its estates. The persons listed above request that their names and addresses be added to the mailing matrix.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and

Demand for Service of Papers nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction or venue of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other right, claim, defense, setoff, or recoupment, in law or in equity, under any agreement, all of which are expressly waived.

Dated: October 30, 2020 Garden City, New York

By: /s/ Lorraine Gazzara Doyle
Lorraine Gazzara Doyle, Esq.
FRIEDMAN VARTOLO, LLP
Attorneys for BSI Financial Services
1325 Franklin Avenue, Suite 230
Garden City, NY 11530
T: (212) 471-5100

F: (212) 471-5150

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## **CERTIFICATE OF SERVICE**

On October 30, 2020, I caused to be served a true copy of the annexed **NOTICE OF APPEARANCE by** mailing the same by First Class Mail in a sealed envelope, with postage prepaid thereon, in a post office or official depository of the U.S. Postal Service, addressed to the last known address of the addressee, and the property address as indicated on the attached Service List annexed hereto.

By: /s/Lorraine Gazzara Doyle
FRIEDMAN VARTOLO LLP
1325 Franklin Avenue, Ste. 230
Garden City, New York 11530
T: (212) 471-5100

F: (212) 471-5150

## **SERVICE LIST**

Charles J. Reeves aka Charles J. Reeves, Jr. 1205 Marvista Street Pittsburgh, PA 15212 **Debtor** 

Shawn N. Wright 7240 McKnight Road Pittsburgh, PA 15237 **Debtor's Attorney** 

Ronda J. Winnecour Suite 3250, USX Tower 600 Grant Street Pittsburgh, PA 15219 *Trustee* 

Office of the United States Trustee Liberty Center. 1001 Liberty Avenue, Suite 970 Pittsburgh, PA 15222 *U.S. Trustee*